2:24-cr-00007-wks Document 1 Filed 01/11/24 Page 1 of 1

> UNITED STATES DISTRICT COURT DISTRICT OF VERMONT

U.S. DISTRICT COURT DISTRICT OF VERMONT

UNITED STATES OF AMERICA

2024 JAN 11 PM 1: 18

v.

JEAN RICHARD AUDATE, Defendant.

INDICTMENT

The Grand Jury charges:

## COUNT ONE

From in or about the summer of 2023 through in or about late 2023, in the District of Vermont and elsewhere, the defendant, JEAN RICHARD AUDATE, did knowingly combine, conspire, and agree with other persons known and unknown, to commit an offense against the United States in violation of Title 18, United States Code, Section 1956, to wit: to knowingly conduct and attempt to conduct financial transactions affecting interstate and foreign commerce, which involved the proceeds of a specified unlawful activity, that is monetary funds, knowing that the transactions were designed in whole or in part to promote the carrying on of the specified unlawful activity, namely conspiracy to commit wire fraud, in violation of 18 U.S.C. §§ 1343, 1349, and that while conducting and attempting to conduct such financial transactions knew that the monetary funds involved in the financial transactions represented the proceeds of some form of unlawful activity.

(18 U.S.C. §§ 1956(h), 1956(a)(1)(A)(i))

FOREPERSON

AS P. KEREST (NTB/PJV)

United States Attorney Burlington, Vermont January 11, 2024